

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
BEAUFORT DIVISION**

UNITED STATES OF AMERICA

v.

RUSSELL LUCIUS LAFFITTE,
Defendant.

Case No.: 9:22-cr-00658-RMG

**NOTICE OF INTENTION TO FILE
REPLY AND REQUEST FOR LEAVE
TO FILE NO LATER THAN APRIL 3,
2023**

On March 9, 2023, Defendant, Russell Lucius Laffitte, through counsel, filed his second motion for new trial (ECF No. 274). By text order dated March 10, 2023, the Court directed the United States to file its Response on or before March 20, 2023 (ECF No. 275). On March 16, 2023 the United States filed (with Mr. Laffitte's consent) a Motion to for an extension of time to file its Response to Mr. Laffitte's motion (ECF No. 278). The Court granted that motion the same day, allowing the United States to file its Response no later than March 24, 2023. (ECF No. 279).

The United States filed its Response on March 23, 2023 (ECF No. 280). Given the arguments made in the Response, Mr. Laffitte respectfully submits that a Reply is necessary and notifies the Court of his intention to file the same. Neither the Federal Rules of Criminal Procedure, nor this Court's Local Rules set a deadline for the filing of a Reply, and the Court has not yet issued an Order setting a deadline for such a filing.

As the Court is aware from a Notice of Protection filed on March 1, 2023 (ECF No. 265), Mr. Parente is currently out of state for an event related to an upcoming family wedding—he departed for Arizona on Thursday, March 23, 2023 and is scheduled to return to South Carolina late on the afternoon of Monday, March 27, 2023. Given Mr. Parente's current absence from the State on a pre-planned family trip, Mr. Laffitte respectfully requests that the Court allow him to

submit his Reply no later than Monday, April 3, 2023.

Undersigned counsel has consulted with Assistant United States Attorney Emily Limehouse (“AUSA Limehouse”) and AUSA Limehouse has advised that the United States does not oppose this request.

Respectfully submitted,

s/ Mark C. Moore

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March 24, 2023
Columbia, South Carolina